

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:) Case No: 18-21273
Terri Son)
Debtor) Chapter: Chapter 13
)
) Judge: Timothy A. Barnes

NOTICE OF MOTION

To: Terri Son, 4221 Saratoga Ave105A, Downers Grove, IL, 60515

Marilyn O. Marshall, 224 S. Michigan Ave. #800 , Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

William Demchak, CEO, PNC Bank, 222 Delaware Ave, Wilmington, DE 19899 (by certified mail)

PLEASE TAKE NOTICE that on **April 4, 2019 at 9:30 am** I shall appear before the Honorable Judge **Timothy A. Barnes** at 219 S. Dearborn, Courtroom 744, Chicago IL 60604 and then and there present the attached **Debtor's Motion for Rule 2004 Examination of PNC Bank**, a copy of which is attached hereto.

By: /s/ Dale Allen Riley
Dale Allen Riley

CERTIFICATE OF SERVICE

I, Dale Allen Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 3/27/2019.

By: /s/Dale Allen Riley
Dale Allen Riley

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960

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ROUTINE MOTION FOR RULE 2004 EXAMINATION OF PNC BANK

NOW COMES the Debtor, Ms. Terri Son (the "Debtor"), by and through her attorneys, Geraci Law L.L.C., to present her **ROUTINE MOTION FOR RULE 2004 EXAMINATION OF PNC BANK**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b)(2).
2. The Debtor filed her Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 07/30/2018.
3. Confirmation of the Debtor's plan is still pending before this Court.
4. The Chapter 13 Trustee has requested various bank statements from the Debtor from the period before her adult son passed away. The Debtor has the bank account information but no longer banks with PNC and so does not have access to the necessary bank statements.
5. The Debtor needs to produce these bank records in order to successfully resolve the Chapter 13 Trustee's pending concerns about her Chapter 13 Plan, specifically her claimed exemption in funds received related to her son's passing.

WHEREFORE THE DEBTOR, Ms. Terri Son, respectfully requests this Honorable Court

enter an order authorizing her to conduct discovery of PNC Bank and for such further relief that this Court deems appropriate.

By: /s/ Dale Allen Riley
Dale Allen Riley

Attorneys for the Debtor

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